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Our File No.: GMF 37-141 U EA/SME

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## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY NEWARK VICINAGE

AMANDRA HICKS, on behalf of herself and others similarly situated,

Plaintiff(s),

-vs-

HEALTH INSURANCE INNOVATIONS, INC.,

Defendant(s).

Civil Action No.: 2:17-cv-03344-SDW-LDW

## E-FILED

DEFENDANT HEALTH INSURANCE INNOVATIONS, INC.'S NOTICE OF MOTION TO DISMISS PLAINTIFF'S COMPLAINT FOR LACK OF PERSONAL JURISDICTION AND IMPROPER VENUE OR, IN THE ALTERNATIVE, TRANSFER VENUE

MOTION RETURNABLE: AUGUST 21, 2017

ORAL ARGUMENT REQUESTED

TO: Sofia Balile, Esq.

LEMBERG LAW, L.L.C.

43 Danbury Road, 3<sup>rd</sup> Floor

Wilton, Connecticut 06897

PLEASE TAKE NOTICE that the attorneys for Defendant, Health Insurance

Innovations, Inc., will move before the United States District Court, District of New Jersey, for

an order dismissing Plaintiff's Complaint pursuant to Fed. R. Civ. P. 12(b)(2) and (3) or, in the

alternative, transferring venue pursuant to 28 U.S.C. § 1406.

PLEASE TAKE FURTHER NOTICE that Defendant will rely upon the Brief,

Certification of Shaji M. Eapen, Esq., and Declaration of Dan Garavuso, all submitted in support

of this Motion.

PLEASE TAKE FURTHER NOTICE that this Motion is accompanied by a proposed

form of Order and may be determined by the Court upon the papers submitted unless opposition

is filed, at which time oral argument is specifically requested.

MORGAN MELHUISH ABRUTYN

Attorneys for Defendant Health Insurance Innovations, Inc.

/s/ Shaji M. Eapen

SHAJI M. EAPEN, ESQ.

Dated: July 20, 2017